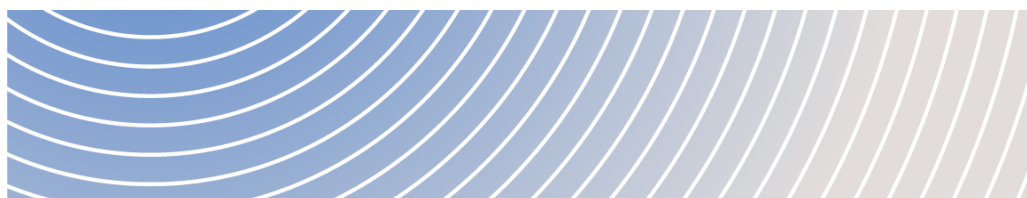




Impact Assessment  
Agency of Canada

Agence d'évaluation  
d'impact du Canada

# What We Heard: Comments to Date on the Rouge National Urban Park Study



May 2023



Canada 



# Introduction

On March 21, 2023, the Minister of Environment and Climate Change requested that the Impact Assessment Agency of Canada (the Agency) work with Parks Canada and Environment and Climate Change Canada to develop the proposed approach and scope for how the Rouge National Urban Park Study (the Study) will be undertaken. The objectives of the Study are to understand the potential effects, including cumulative effects, of past, ongoing, and potential future development on the integrity of the Rouge National Urban Park and on the Park's management objectives.

Draft Terms of Reference for the Study will be made publicly available for a review and comment period in spring 2023, and are anticipated to be finalized before the end of June 2023. A Committee would be appointed to carry out the Study, likely in early summer 2023.

The Agency is committed to considering comments from the public to inform the Terms of Reference for the Study. At this time, the Agency considered public views and comments about the Study which have been gathered through:

- In-person public information sessions on May 2, 2023;
- Virtual public information session on May 4, 2023; and
- Correspondence as well as online comments sent to the Agency or the Minister of the Environment and Climate Change.

The table entitled “Summary of comments from the public” below summarizes the comments and issues raised by the public in the planning process. The Agency considered these comments in the development of the draft Terms of Reference for the Study.

## Summary of Comments from the Public

Element	Issue
<b>Agriculture</b>	<ul style="list-style-type: none"><li>• Need to protect the Duffins Rouge Agricultural Preserve given it is primarily class one farming land and role in growing high quality food</li><li>• Loss of agricultural lands and its impact on the farming community</li><li>• Loss of agricultural services and community</li><li>• Loss of local agricultural land knowledge due to the closing of farms and displacement of farmers</li><li>• Suggest designating all agricultural land in the Rouge National Urban Park as “certified organic”</li></ul>



<b>Air Quality</b>	<ul style="list-style-type: none"><li>• Effects to air quality and impacts of those effects on human health, the biophysical environment and ecosystem health and function</li></ul>
<b>Climate Change and greenhouse gases Emissions</b>	<ul style="list-style-type: none"><li>• Effects of deforestation, including the loss of carbon sinks</li><li>• Implications on Canada's ability to meet national greenhouse gases reduction commitments and climate goals</li><li>• Concern about the carbon footprint of potential development activities</li><li>• Impacts of direct and induced carbon emissions resulting from development activities</li><li>• Need to protect agricultural lands in the context of the climate crisis and its impacts on food supplies</li></ul>
<b>Cumulative Effects</b>	<ul style="list-style-type: none"><li>• Importance of cumulative effects assessments, including for the Rouge River and Duffins Creek watersheds</li><li>• Long-term and cumulative effects to wildlife and species at risk, including effects to migration corridors</li><li>• Long-term and cumulative effects to fish and fish habitat</li><li>• Cumulative effects that may result from multiple recent legislative and regulatory changes made by the Ontario government</li><li>• Concern about baseline given the area was mostly woodland and farmland in the 1960s</li><li>• Concern about cumulative impacts of future development projects on contaminant levels of land and water in the Duffins Rouge Agricultural Preserve and downstream under a range of infrastructure and climate scenarios</li></ul>
<b>Development Projects of Concern</b>	<ul style="list-style-type: none"><li>• Concern about Region of Durham development plan, developments planned in the York region, Whites Road extension in Pickering, airport project on Transport Canada federal lands, skyscraper and high-rise proposed buildings in the region, decommissioning of the Pickering Nuclear Generating Station, and development adjacent to the Greenwood Conservation Area in Ajax</li><li>• Legislative concerns with respect to development in the Duffins Rouge Agricultural Preserve in relation to commitments by the Ontario government to protect Duffins Rouge Agricultural Preserve lands in perpetuity</li><li>• Need to prevent developments before they start, as irreversible environmental effects may occur as soon as development starts</li><li>• Support for designation of projects under the <i>Impact Assessment Act</i> by the Minister of Environment and Climate Change</li></ul>
<b>Differential Impacts upon Diverse Persons and Groups</b>	<ul style="list-style-type: none"><li>• Differential impacts based on sex and gender, which may include groups identified by age, place of residence, ethnicity, socio-economic status, employment status or disability</li><li>• Need to include a diverse representation of views including from Indigenous Peoples, racialized people and people with disabilities</li><li>• Need to include views from the lived experiences of people in marginalized groups</li></ul>



who interact with the Rouge National Urban Park

- Need for barrier-free, accessible engagement sessions, including the use of American Sign Language, Quebec Sign Language, captions, screen descriptions and documents provided in accessible screen readable format with alternative text
- Concern about inequitable positive and adverse impacts of development between developers or corporations and local residents

**Economic Conditions**

- Need for long-term economic and environmental sustainability in relation to development in the Study area
- Loss of cultural and tourism values in the Rouge National Urban Park and adjacent areas, including reduced access, changes to plant, fish and wildlife resources, visual quality and increased noise
- Concern about decreased property value, including resulting from reduced storm water runoff conditions and flooding
- Impacts of developments on nature-based schools and outdoor education programs including impacts to local employment and community well-being

**Ecosystems, Flora, and Fauna**

- Loss of biodiversity, and effects to environmentally sensitive lands and wilderness areas
- Loss of hedgerows and riparian corridors
- Impacts to woodlands and the health of forest communities
- Impacts to shrublands and pastures
- Habitat fragmentation and impacts on wildlife
- Connectivity to Oak Ridges Moraine and Lake Ontario
- Loss of pollinator habitat and rare plants
- Increase in roadkill due to development activities, and need to reduce mortality through wildlife corridors
- Increase in fire risk to wildlife
- Increase in noise pollution
- Encroachment by invasive or non-native plants resulting from urbanization
- Need for conservation and preservation of the environment to be sustainable for future generations

**Federal Lands**

- Effects to the Rouge National Urban Park, its ecological integrity and its ability to meet its park management plan objectives
- Impacts of potential developments within Transport Canada federal lands

**Fish and Fish Habitat**

- Impacts to fish and fish habitat, including to brown trout, rainbow trout, American Eel, Coho salmon and Chinook salmon in Little Rouge river, Rouge river, Petticoat creek, Duffins creek, and their tributaries
- Degradation or loss of fish habitat and resulting impacts on fish populations
- Impacts of road salts resulting from developments on tributaries



- Impacts to conditions of stream and water bodies, including benthic communities
- Pollution of fish-bearing stream tributaries
- Degradation of aquatic ecological corridors and connectivity

**Human Health and Well-Being**

- Effects to air quality and health impacts to local residents, tourists, and recreational users
- Impacts to physical health, mental health and spiritual health of Rouge National Urban Park users due to reduced access and user experience
- Impacts from noise resulting from or induced by development
- Impacts to recreational uses of Highland Creek Trail, Port Union Waterfront Park, Twyn Rivers Day Use Area, Celebration Forest Trail, Toronto's Morningside Park, and Scarborough's Highland Park
- Light pollution due to development activities
- Impacts resulting from the urban heat island effect
- Concern about increased traffic leading to more accidents, notably on Brock road

**Indigenous peoples' Aboriginal and Treaty Rights**

- Impacts of development on the exercise of Aboriginal and Treaty rights and related cultural practices
- Need to meet the requirement for free, prior and informed consent of Indigenous Peoples
- Need to respect Indigenous land claims
- Need to respect Indigenous heritage sites

**Methodology**

- Concern that the Study will not be completed before developments are scheduled to begin
- Concern that the Study does halt or delay potential developments from being proposed or constructed
- Concern that the results of the next federal election could impact the Study
- Suggest to expand the geographic scope of the Study beyond the Duffins Rouge Agricultural Preserve
- Need for the Study Report to be gradually released or for preliminary versions of the report to be made available before 2025 in order for the Study to inform development activities before they are initiated
- Need to examine provincial ministerial zoning orders in the region, including the casino area and wetland areas
- Need to examine impacts of other legislative changes by the Ontario government, including the elimination of Ontario's Conservation Authorities' powers to deny permits when a ministerial zoning order is issued
- Need to collect additional data, including a comprehensive multi-year breeding bird study as well as targeted species-specific surveys and modelling
- Need for a risk-benefit assessment



- Need for an assessment of potential conservation measures that would avoid, mitigate or compensate impacts
- Need to assess required buffer areas around significant habitats
- Suggest reclamation of language around development
- Suggest enacting a new Duffins Rouge Agricultural Preserve Act, harmonized with provincial policies on its protection
- Suggest using data from bio-blitzes
- Suggest carrying spatial analysis in a Geographic Information System to assess impacts
- Suggest exploring granting legal personhood to rivers and areas of land in the Rouge National Urban Park in order to protect them
- Suggest measuring ecological capital
- Suggest communicating with regional developers about the Study
- Suggest evaluating all natural lands within the Duffins Rouge Agricultural Preserve for significance and required protection
- Suggest to assess the need and scope of the government of Ontario's decision to open the Duffins Rouge Agricultural Preserve to housing and commercial developments and explore possible alternatives and mitigation measures

**Migratory Birds and their Habitat**

- Impacts to migratory birds, including their habitat, from development activities including from destruction, disturbance and fragmentation of habitat (including ability to forage and nest), habitat avoidance, sensory disturbance (including light and noise pollution) and the disturbance and destruction of individuals, nests and eggs
- Impacts of opportunistic predators associated with urban areas
- Impacts to Great Blue Heron population which is already reduced by development, including in the area of Taunton Road as well as in the Cherrywood Swamp Complex
- Impacts to myoclonic waterfowl
- Concern about impacts to geology given the unique geology of the area creates unique habitat for birds
- Specific concern about cliff, bank, and barn swallows and their habitat
- Specific concern with respect to bird nests around Petticoat Creek

**Social Conditions**

- Loss of access to areas used for recreational purposes, including the Seaton Trail located along the West Duffins Creek
- Impacts on food security
- Loss of access to areas used for learning and education, including children's programs such as girl guides in and around Rouge National Urban Park
- Impacts on university and college programs and studies that use the Rouge National Urban Park and Duffins Rouge Agricultural Preserve
- Impacts to canoeing and portaging resulting from reduced water levels



- Impacts to Pickering's Whitevale community
- Concern about heritage sites and resources, as well as the preservation of old farmhouses
- Concern about urban sprawl, including density, growth and walkability of existing communities

**Sources of information and knowledge**

- Toronto and Region Conservation Authority data and studies, notably on land-use planning, groundwater, storm water, tree canopy and green development standards
- Information and data from the Toronto Zoo, including Toronto Zoo's turtle conservation programs and Turtle Tally project
- Information from Toronto and Region Conservation Authority's Owl Prowl program
- Data from Earthub, Ontario GeoHub, or similar environmental hubs
- Citizen science data such as iNaturalist, ebird, Birds Canada's Feeder Watch project and Audubon Christmas Bird Count
- Publicly available data, including the Ontario Breeding Bird Atlas, Ontario Butterfly Atlas, Ontario Reptile and Amphibian Atlas, and Natural Heritage Information Centre
- Reports from the Committee on the Status of Endangered Wildlife in Canada
- Data and studies from the University of Toronto and Centennial College
- Environmental Impact Studies provided to the city of Pickering
- Environmental Defence's "Developing disaster" report
- "Species and Ecosystems at Risk in the Duffins Rouge Agricultural Preserve: Considerations for a Federal Cumulative Effects Study" report by Karl Heide submitted to Environmental Defence
- Ontario's Housing Affordability Task Force report
- "Existing housing unit capacity identified in municipal land needs assessments prepared for upper- and single-tier municipalities in the Greater Horseshoe" report by Kevin Eby for The Alliance for a Liveable Ontario
- Information from non-governmental organizations, including studies on the natural capital of Greenbelt lands by the David Suzuki Foundation and Birds Canada's Great Lakes Marsh Monitoring Program
- Information from neighbors and community groups in the Study region
- Information from Indigenous groups
- Information on developments in Seaton

**Species at Risk and their Habitat**

- Impacts to federally listed species at risk, including their habitat (as a result of habitat loss, alteration and fragmentation), direct and indirect mortality, sensory disturbance and functional habitat loss
- Impacts of the introduction of invasive species, including phragmites
- Specific concern about red-headed woodpecker, cerulean warbler, Canada warbler, golden-winged warbler, least bittern, redbelted dace, yellow-breasted chat, barn swallow, bank swallow, bobolink, wood thrush, Eastern meadowlark, Eastern Wood-



pewee, Eastern loggerhead shrike, Eastern whip-poor-will, common nighthawk, black tern, Acadian flycatcher, yellow-banded bumblebee, Blanding's turtle, Eastern musk turtle, snapping turtle, midland painted turtle, Northern map turtle, tri-coloured bat, Northern long-eared myotis, little brown bat, North American river otter, North American beaver, American mink, Eastern milksnake, Atlantic salmon, Eastern pondmussel, black purseweb spider, butternut, black ash, bashful bulrush and monarch butterfly

**Water**

- Concern that the provincial regulatory system will not adequately protect watersheds
- Impacts to aquifers
- Impacts to water flow and levels of local creeks and rivers
- Concern about increased storm water runoff, flooding, water quality, water turbidity and contaminate from road salts, including to the Rouge River

**Wetlands**

- Effects to wetlands through development and changes to water quality, including wetland loss, reduction, alteration and change in wetland function
- Effects to wetland communities and ecological functions, including the availability and quality of wetland habitat for migratory birds and other wildlife
- Impacts to wetlands downstream of the Duffins Rouge Agricultural Preserve, due to increased runoff and contaminants
- Need for an assessment of wetland significance
- Specific concern with respect to potential effects to Amos pond
- Specific concern with respect to the Cherrywood Swamp Provincially Significant Wetland

## What's next

The draft Terms of Reference for the Study will be posted for a public comment period.

The Agency will consider any further comments received in the final version of the Terms of Reference for the Study.

The Agency also heard from 56 members of the public on their preferences with respect to future engagement opportunities. The Agency notes 52% of respondents indicated a preference for in-person community meetings, and 46% for a videoconference format. This information, along with attendance at previous public sessions and any future comment received, will inform the Agency's engagement approach going forward.

To find out the latest about the status of the Study, comment periods, and next steps, please refer to the [Canadian Impact Assessment Registry \(Reference number: 84459\)](#).